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March 9, 2022

VIA ECF

Honorable Lorna G. Schofield
United States District Judge
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *Jane Doe, et al. v. Trump Corp., et al.*
Case No. 1:18-cv-9936 (LGS)

Dear Judge Schofield:

We write on behalf of Defendants to address Plaintiffs' March 1, 2022 request for a pre-motion conference as to a discovery dispute with non-parties Anne Archer Butcher and Dolphin Media Group (the "Marketing Consultants"). We take no position as to the merits of the application, which focus on privilege assertions by the Marketing Consultants. This letter is intended only to state Defendants' position that the documents referenced in Plaintiffs' application (DE 365) they produced as confidential under the Protective Order herein should retain their designation as confidential. Those documents are identified as TTO_003221 and 003226. Defendants take no position as to the confidential status of the documents produced by other parties or non-parties that are referenced in their application. We would be pleased to provide additional briefing in support of the confidential designations if the Court chooses to address that issue in the course of adjudicating Plaintiffs' application.

Thank you for your attention to this matter.

Respectfully,

/s/ Peter T. Shapiro

Peter T. Shapiro

cc: all counsel of record (via ECF)

Hon. Lorna G. Schofield
August __, 2021
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